## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

:

UNITED STATES OF AMERICA, ex rel.
DILBAGH SINGH, M.D.,
PAUL KIRSCH, M.D.,
V. RAO NADELLA, M.D., and
MARTIN JACOBS, M.D.,

:

Relators,

.

v. : Civil Action No. 04-186E

:

BRADFORD REGIONAL

MEDICAL CENTER,

V & S MEDICAL ASSOCIATES, LLC,

PETER VACCARO, M.D.,

KAMRAN SALEH, M.D.,

and DOES I through XX,

:

Defendants. :

# UNOPPOSED MOTION FOR AN EXTENSION OF TIME FOR DEFENDANTS TO FILE THEIR ANSWERS

COME NOW Bradford Regional Medical Center, V & S Medical Associates, LLC, Peter Vaccaro, M.D. and Kamran Saleh, M.D. (hereinafter referred to as "Defendants"), by and through their undersigned attorneys, and move this Court to enter an order granting Defendants an additional sixteen (16) days, up to and including October 13, 2006, within which to file their Answers and other responsive pleadings, including all defenses, affirmative defenses, and all matters of every description which might be included in responsive pleadings. In support of this Motion, Defendants state as follows:

- 1. Defendants' responsive pleadings are currently due to be filed with this Court on September 27, 2006.
- 2. Defendants respectfully request an extension up to and including October 13, 2006 to file their responsive pleadings, including all defenses, affirmative defenses, and all matters of every description which might be included in responsive pleadings.
- 3. This Motion is not made for the purpose of delay, and the Government and Relators will not be prejudiced by the short extension requested.
- 4. Counsel for Relators and for the Government have informed counsel for the Defendants that they have no objection to the extension.

WHEREFORE, Defendants respectfully request that this Honorable Court enter an Order granting them an additional sixteen (16) days, up to and including October 13, 2006, within which to file their responsive pleadings, including all defenses, affirmative defenses, and all matters of every description which might be included in responsive pleadings.

Respectfully submitted this 19th day of September, 2006.

/s/ Daniel M. Mulholland III

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### /s/ Carl J. Rychcik

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Attorneys for Defendants

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:

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:

#### **ORDER**

Upon presentment of the AGREED MOTION FOR AN EXTENSION OF TIME FOR DEFENDANTS TO FILE THEIR RESPONSIVE PLEADINGS, due notice having been given and the Court being fully advised in the premises, it is hereby ordered:

Defendants shall have until and through October 13, 2006 to file their responsive pleadings, including all defenses, affirmative defenses, and all matters of every description which might be included in responsive pleadings.

SO ORDERED this \_\_\_\_\_ day of September, 2006.

Maurice Cohill, Senior Judge U.S. District Court Western District of Pennsylvania

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the attached documents was filed electronically with the United States District Court for the Western District of Pennsylvania and also served on each of the following attorneys via First Class United States Mail on the date set forth below:

Jay D. Marinstein, Esquire Carl J. Rychcik, Esquire Fox Rothschild LLP 625 Liberty Avenue 29th Floor Pittsburgh, PA 15222-3115

Andrew M. Stone, Esquire Stone & Stone 828 Frick Building 437 Grant Street Pittsburgh, PA 15219

Robert L. Eberhardt, Esquire United States Attorney's Office Civil Division USPO & Courthouse Pittsburgh, PA 15219

Michael Granston, Esquire U.S. Department of Justice Commercial Litigation Branch P.O. Box 261 Ben Franklin Station Washington, DC 20044

September 19, 2006

/s/ Daniel M. Mulholland III
Daniel M. Mulholland III